

**TRIUMVIRATE
ENVIRONMENTAL**

April 18, 2014

Office of Enforcement and Compliance Assurance
Office of Federal Activities -International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Re: 2013 Annual Hazardous Waste Export Report for EPA Notice No: 006514/2E/13

To Whom It May Concern:

Please see the corrected summary, with all the required information, of hazardous waste exports, for calendar year 2013, shipped by Triumvirate Environmental Inc. under EPA Notice No. 006514/2E/13 is listed below. There was one shipment in 2013.

Waste was exported from:
Triumvirate Environmental Inc.
41 Tanner Street
Lowell, MA 01852
EPA ID# MAC300013695

Consignee:
Xstrata Canada Corporation-Xstrata Nickel Sudbury Smelter
1 Longyear Drive
Falconbridge, ON Canada POM150

PERMIT 505670

STREAM: 1

1 LOADS

TOTAL KG: 18395

Certification Statement:

I certify under the penalty of law that I have personally examined and familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.
Regards,

Steven Powers
General Manager
Triumvirate Environmental, Inc.

263 HOWARD ST
LOWELL, MA
978.453.7772
TRIUMVIRATE.COM

received
5011 4/23/2014

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EXPORTER:

TRIUMVIRATE ENVIRONMENTAL (MERRIMACK), INC.

41 Tanner Street

Lowell, MA 01852

MAC300013695

US EPA Notice 006514/2E/13

File Number : 505670

Consignee:

Xstrata Canada Corporation-Xstrata Nickel Sudbury Smelter

1 Longyear Drive

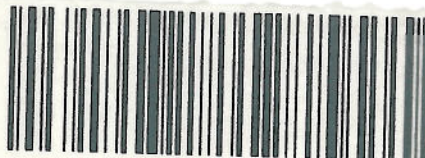
Falconbridge, ON Canada POM1S0

<u>Shipment Date</u>	<u>Product-Description</u>	<u>DOT</u> <u>Class</u>	<u>Amt Shipped</u>	<u>Qty Pounds Shipped</u>	<u>Manifest #</u>	<u>Transporter-EPA ID Number</u>
4/23/2013	Lithium Ion Batteries, UN3480, PG II	9	15 Pallets	39,970	BOL042313TD	Transport Rollex LTEE-NYF006000053

2

TRIUMVIRATE
ENVIRONMENTAL

263 HOWARD STREET
LOWELL, MA
01852



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APR 22 2014

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Office of Enforcement + Compliance Assurance
Office of Federal Activities
International Compliance Division (2054A)
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 14 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Dear Mr. Powers:

As you know, primary exporters of hazardous waste must file an annual report with EPA by March 1 of each year summarizing their exports during the previous calendar year. The annual report must include all information specified in 40 CFR 262.56 of the regulations. We have now concluded our review of the annual reports filed in 2014 for shipments made during calendar year 2013.

The 2013 annual report which you filed in 2014 is deficient in the following areas:

- _____ EPA Identification number
- _____ name, mailing address and site address of exporter
- _____ calendar year covered by the report
- _____ name and address of each consignee

by consignee, for each hazardous waste exported:

- ☒ a description of the hazardous waste
- ☒ EPA waste number (from 40 CFR part 261, subpart C or D)
- ☒ DOT hazard class
- ☒ the name and EPA ID number of each transporter used
- ☒ total amount of waste shipped and number of shipments (frequency) pursuant to each notification

Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to 262.41, in even numbered years:

- _____ a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated and

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_____ a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984

_____ a certification signed by the primary exporter which states:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

ACTION REQUIRED

_____ Please provide the missing information identified above in order to complete your annual report, together with an original signed certification as required by the regulation, as stated above. These items may be mailed to International Compliance Assurance Division/OFA/OECA, U.S Environmental Protection Agency (Mail Code 2254A), 1200 Pennsylvania Avenue, NW, Washington, DC 20460. Courier address: International Compliance Assurance Division/OFA/OECA, U.S. Environmental Protection Agency, Ariel Rios Building, Room 6144, 1200 Pennsylvania Avenue, NW, Washington, DC 20004. **Reports may also be faxed to 202/564-0073.**

✓
_____ Enclosed is the annual report you submitted to us. We are returning it because a report with the indicated information missing cannot be accepted for processing. Please submit a complete annual report with signed certification to either the mailing or courier addresses above

This request to provide a complete annual report does not preclude or limit the USEPA from taking an enforcement action(s) for the initial failure to submit a timely or complete annual report as is required by 40 CFR 262.56.

Sincerely,

Scott D. Wilson

Robert G. Heiss, Director
International Compliance Assurance Division
Office of Federal Activities

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p style="margin-left: 20px;">STEVEN POWERS TRIMMEDIATE ENVIRONMENTAL 41 TANNER STREET LOWELL, MA 01852</p>	<p>A. Signature <div style="display: flex; justify-content: space-between;"> X <i>[Signature]</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee </div> </p> <p>B. Received by (Printed Name) <i>Valene Spriani</i> </p> <p>C. Date of Delivery <i>4/10</i> </p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No </p>
<p>2. Article Number (Transfer from service label) <div style="border: 1px solid black; padding: 2px; display: inline-block;">7008 3230 0000 9485 0063</div> </p>	<p>3. Service Type</p> <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail </div> <div> <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D. </div> </div> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1548

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Sent To *Steven Powers TEM (Merrimack) Inc.*

Street, Apt. No.,
or PO Box No. *sent* **APR 14 2014**

City, State, ZIP+4

PS Form 3800, August 2006 See Reverse for Instructions

**TRIUMVIRATE
ENVIRONMENTAL**

February 27, 2014

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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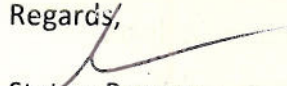
PERMIT 505670

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Steven Powers
General Manager
Triumvirate Environmental (Merrimack), Inc.

263 HOWARD ST
LOWELL, MA
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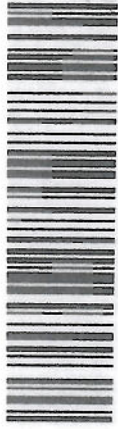
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TRIUMVIRATE
ENVIRONMENTAL

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20460

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To: Enforcement and Compliance
Assurance

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